



## Moser Law Firm, PC

5 E MAIN ST  
HUNTINGTON, NY 11743  
United States  
Phone: 516-671-1150  
Fax: 516-882-5420

## STATEMENT

Invoice # 83  
Date: 08/05/2021  
Due On: 09/04/2021

Joseph Connors

**20-00008**

### Connors v. SeniorCare and AMR

Date	Notes	Attorney	Quantity	Rate	Total
06/01/2020	Case Building: Telephone Call with Client - Interview with Paul Pagano	SJM	1.60	\$450.00	\$720.00
06/01/2020	Case Building: Telephone call with Paul Pagano re case evaluation	SJM	0.30	\$450.00	\$135.00
06/01/2020	Case Building: Email to P Pagano re AMR	SJM	0.10	\$450.00	\$45.00
06/01/2020	Case Building: Create NetDocuments matter No. 20-FLSA-0008	SJM	0.20	\$450.00	\$90.00
06/01/2020	Case Building: Create Clio matter No. 20-00008	SJM	0.10	\$450.00	\$45.00
06/01/2020	Case Building: Preliminary Investigation - Online research and review of AMR and GMR website, news articles re NY deployment	SJM	2.40	\$450.00	\$1,080.00
06/01/2020	Case Building: Online research - locate corporate information with NYS DOS for SeniorCare	SJM	0.20	\$450.00	\$90.00
06/01/2020	Case Building: Online Research - located corporate information with NYS DOS for AMR	SJM	0.10	\$450.00	\$45.00
06/01/2020	Case Building: Online Research - locate corporate information with NYS DOS for AMR of NY, Inc.	SJM	0.10	\$450.00	\$45.00
06/01/2020	Case Building: Online research: News Videos of AMR CEO Van Horne and GMR government Liaison; record and upload to NetDocs	SJM	0.50	\$450.00	\$225.00
06/01/2020	Case Building: Legal research re: Private Right of	SJM	0.50	\$450.00	\$225.00

Action under Service Contract Act					
06/01/2020	Case Building: Retrieve wage determinations applicable to service contracts for New York City and upload to netdocuments	SJM	0.60	\$450.00	\$270.00
06/01/2020	Telephone call with client	PP	1.40	\$375.00	\$525.00
06/02/2020	Case Building: Telephone meeting with SJM and PP regarding retainer and investigation	SJM	0.60	\$450.00	\$270.00
06/03/2020	Case Building: Prepare emergency contact form, class action rider, and consent to electronic communication and email to PP to be furnished to client.	SJM	0.60	\$450.00	\$270.00
06/03/2020	Case Building: Prepare "dos & dont's", client's rights & responsibilities, facebook information, and forward to PP to be furnished to client.	SJM	0.40	\$450.00	\$180.00
06/03/2020	Telephone calls with Joe Connors re next steps, emails with Joe Connors re documents and Foil Request, draft FOIL request, email Foil Request	PP	0.90	\$375.00	\$337.50
06/09/2020	Case Building: Review file to prepare for Zoom meeting with Client	SJM	0.20	\$450.00	\$90.00
06/09/2020	Case Building: Zoom meeting with Joseph Connors and Paul Pagano	SJM	1.00	\$450.00	\$450.00
06/09/2020	Case Building: Telephone call to Paul Pagano re case evaluation post Zoom meeting	SJM	0.40	\$450.00	\$180.00
06/09/2020	Zoom Conference with Steven Moser and Joseph Connors re claims, investigation, and materials needed	PP	1.00	\$375.00	\$375.00
06/10/2020	Case Building: Telephone call from P. Pagano re causes of action and case strategy	SJM	0.50	\$450.00	\$225.00
06/10/2020	Case Building: Legal research regarding overlap of Services Contract Act and Fair Labor Standards Act - see notes.	SJM	3.20	\$450.00	\$1,440.00
06/10/2020	Case Building: Continue legal research regarding interplay between SCA and FLSA. Draft descriptive titles to case quotes and email to P. Pagano.	SJM	2.50	\$450.00	\$1,125.00
06/11/2020	Case Building: Emails btwn SJM and PP to schedule interview of Connors' partner for 6/11/2020	SJM	0.10	\$450.00	\$45.00
06/25/2020	TC with Joe Connors re status and next steps	PP	0.20	\$375.00	\$75.00
06/29/2020	Telephone calls with Connors re Ambulnz action, review Ambulanz complaint, work on complaint	PP	0.50	\$375.00	\$187.50
06/29/2020	Pre-Trial Pleadings and Motions: Telephone call with P. Pagano regarding filing of complaint	SJM	0.20	\$450.00	\$90.00
06/30/2020	Pre-Trial Pleadings and Motions: Telephone call with P	SJM	0.10	\$450.00	\$45.00

Pagano re filing of complaint					
06/30/2020	Work on complaint, proposed summonses, civil cover sheet, TCs with Connors and Luna Rubio	PP	5.10	\$375.00	\$1,912.50
07/01/2020	Pre-Trial Pleadings and Motions: Revise complaint	SJM	2.00	\$450.00	\$900.00
07/01/2020	Pre-Trial Pleadings and Motions: Complete edits of complaint and email to P. Pagano	SJM	1.00	\$450.00	\$450.00
07/01/2020	Finalize complaint, proposed summonses, civil cover sheet, e-file all, telephone calls with Joe Connors and Jose Luna Rubio	PP	1.70	\$375.00	\$637.50
07/07/2020	TC and emails with Bryan Schwartz, Esq. re service of complaint	PP	0.10	\$375.00	\$37.50
07/08/2020	Research on general counsel for AMR, TC with J Gombo, emails with J. Gombo and T. Brown	PP	0.20	\$375.00	\$75.00
07/09/2020	Review email from AMR counsel	PP	0.10	\$375.00	\$37.50
07/14/2020	Telephone call with Tyler Brown and begin draft of waiver documents	PP	0.30	\$375.00	\$112.50
07/15/2020	Finalize waiver documents, emails with opposing counsels, telephone call with Joseph Connors re next steps	PP	0.40	\$375.00	\$150.00
07/16/2020	Emails with Roger Briton and e-file waivers	PP	0.10	\$375.00	\$37.50
07/30/2020	Review order and calendar dates	PP	0.10	\$375.00	\$37.50
09/18/2020	Review filed documents, start work on pre-trial letter	PP	0.30	\$375.00	\$112.50
09/21/2020	Work on pre-conference letter, scheduling order, email with opposing counsel	PP	0.80	\$375.00	\$300.00
09/23/2020	TC with Brendan Sweeney, email with same re Court submissions	PP	0.10	\$375.00	\$37.50
09/24/2020	TC with Brendan Sweeney, revise pre-conference letter and proposed order, email with Brendan Sweeney re same	PP	0.20	\$375.00	\$75.00
09/25/2020	Finalize and e-file submissions to Court, email with opposing counsel re same	PP	0.20	\$375.00	\$75.00
09/30/2020	TC with Brendan Sweeney re mediation, Court order	PP	0.10	\$375.00	\$37.50
10/01/2020	TCs with mediator Andrew Kimmel and Brendan Sweeney re mediation	PP	0.20	\$375.00	\$75.00
10/02/2020	TCs with Brendan Sweeney and Court for initial conference	PP	0.30	\$375.00	\$112.50
10/06/2020	Tcs with opposing counsel and potential mediator, review Court orders and calendar dates	PP	0.40	\$375.00	\$150.00

10/07/2020	Continued review of Court orders and TC with Brendan Sweeney re same	PP	0.10	\$375.00	\$37.50
10/12/2020	TC with Brendan Sweeney and emails with mediator	PP	0.10	\$375.00	\$37.50
10/13/2020	TC with clients re mediation date	PP	0.10	\$375.00	\$37.50
10/14/2020	TC with Brendan Sweeney and mediator, email with Brendan Sweeney and mediator re mediation date	PP	0.60	\$375.00	\$225.00
10/16/2020	Draft letter to Court re mediation status, e-file same, TC with opposing counsel re letter to Court, review emails re mediation date, email with client re date of mediation	PP	0.30	\$375.00	\$112.50
10/30/2020	Review Southern District protocol for mediation, email to clients with same, and TC with Joe Connors re same	PP	0.40	\$375.00	\$150.00
11/03/2020	Case Building: Telephone call from P. Pagano to SJM re: arbitration agreement being distributed	SJM	0.20	\$450.00	\$90.00
11/03/2020	Review email from Jose Luna Rubio, TCs with Rubio and Connors, email with opposing counsel re arbitration agreements	PP	0.30	\$375.00	\$112.50
11/04/2020	Case Building: Telephone call to R. Briton re class action waiver and arbitration agreement	SJM	0.10	\$450.00	\$45.00
11/05/2020	Case Building: Telephone call with P. Pagano regarding arb agreements distributed by seniorcare	SJM	0.10	\$450.00	\$45.00
11/05/2020	Case Building: Telephone call with R. Briton re class action waiver and arbitration agreement	SJM	0.20	\$450.00	\$90.00
11/05/2020	Case Building: Review arbitration and class action waiver and email Paul Pagano re same	SJM	0.20	\$450.00	\$90.00
11/05/2020	TC and email with Jose Luna Rubio re arbitration agreement	PP	0.10	\$375.00	\$37.50
11/06/2020	Initial review of Connors' documents for production	PP	0.20	\$375.00	\$75.00
11/09/2020	LM for Jose Luna Rubio, TC with Joe Connors re needed documents, work on document production	PP	0.30	\$375.00	\$112.50
11/10/2020	TC with Jose Luna Rubio re needed documents	PP	0.10	\$375.00	\$37.50
11/16/2020	Review client documents	PP	0.30	\$375.00	\$112.50
11/17/2020	Continued review of documents, TC with Joe Connors	PP	0.80	\$375.00	\$300.00
11/18/2020	Work on damages analysis, continued review of documents, email and TCs with clients, email with opposing counsel re call	PP	2.60	\$375.00	\$975.00
11/19/2020	Work on document production and damages calculation, legal research re same, TC with client	PP	3.30	\$375.00	\$1,237.50
11/23/2020	Emails with Brendan Sweeney re pre-mediation	PP	0.30	\$375.00	\$112.50

	documents and damages analysis, review DOL opinion letter re manual workers/EMTs				
11/24/2020	Review of document production from opposing counsel, TC with Joe Connors re same, emails with opposing counsel re same	PP	0.20	\$375.00	\$75.00
11/27/2020	Conduct class based damages analysis	PP	3.50	\$375.00	\$1,312.50
11/30/2020	TC with Brendan Sweeney re damages analysis, begin drafting mediation statement	PP	2.20	\$375.00	\$825.00
12/01/2020	Finalize draft of pre-mediation statement	PP	0.50	\$375.00	\$187.50
12/02/2020	Settlement: Review and edit ex-parte settlement statement	SJM	0.50	\$450.00	\$225.00
12/03/2020	Revise pre-mediation statement, emails with mediator and B. Sweeney re brief	PP	0.30	\$375.00	\$112.50
12/04/2020	Email mediation statement and exhibits to mediator, email with clients re mediation prep	PP	0.10	\$375.00	\$37.50
12/08/2020	Settlement: Prepare supplemental ex parte mediation statement	SJM	3.10	\$450.00	\$1,395.00
12/08/2020	Settlement: Email supplemental ex parte mediation statement to Brendan Sweeney	SJM	0.10	\$450.00	\$45.00
12/09/2020	Zoom meeting with mediator	PP	1.10	\$375.00	\$412.50
12/10/2020	Telephone call with Brendan Sweeney re mediation, review of letter from Brendan Sweeney, begin working on response	PP	0.30	\$375.00	\$112.50
12/11/2020	Settlement: Telephone call with paul pagano re supplemental mediation statement(s)	SJM	0.30	\$450.00	\$135.00
12/11/2020	TC with mediator re mediation, review case law on point, review draft letter to opposing counsel, emails with S. Moser with same	PP	0.30	\$375.00	\$112.50
12/14/2020	Settlement: Zoom Call with clients to prepare for mediation	SJM	1.00	\$450.00	\$450.00
12/14/2020	Mediation prep with clients	PP	1.00	\$375.00	\$375.00
12/15/2020	Settlement: Participate in mediation session	SJM	6.60	\$450.00	\$2,970.00
12/15/2020	Conduct mediation	PP	8.20	\$375.00	\$3,075.00
12/17/2020	TC with Joe Connors re mediation and next steps	PP	0.80	\$375.00	\$300.00
12/21/2020	TC with opposing counsel re contract, legal research on qui tam actions, FOIA requests	PP	1.10	\$375.00	\$412.50
01/04/2021	Emails with opposing counsel re contract/mediation	PP	0.10	\$375.00	\$37.50

01/05/2021	Email with opposing counsel re Jose Luna Rubio and California deployment	PP	0.10	\$375.00	\$37.50
01/07/2021	TC with opposing counsel re contract, review contract, legal research re Service Contract Act, revise damages analysis	PP	2.30	\$375.00	\$862.50
01/08/2021	Draft settlement letter, conference call with clients re settlement demand, email to S. Moser with same	PP	2.60	\$375.00	\$975.00
01/11/2021	Review additional pay stubs, revise demand letter, email to S. Moser with same	PP	0.50	\$375.00	\$187.50
01/12/2021	Finalize and email settlement letter and damages chart to Brendan Sweeney	PP	0.20	\$375.00	\$75.00
01/13/2021	TC with Brendan Sweeney re settlement, draft letter to Court re extending time for mediation, email with B. Sweeney re same, efile letter with Court	PP	1.00	\$375.00	\$375.00
01/15/2021	TC with Brendan Sweeney re settlement	PP	0.10	\$375.00	\$37.50
01/16/2021	TC with Joe Connors re counteroffers	PP	0.20	\$375.00	\$75.00
01/16/2021	TC with Jose Luna Rubio re counteroffers	PP	0.20	\$375.00	\$75.00
01/22/2021	TC with Brendan Sweeney re settlement	PP	0.10	\$375.00	\$37.50
01/25/2021	Review email from opposing counsel re settlement	PP	0.10	\$375.00	\$37.50
01/26/2021	TC with Brendan Sweeney re settlement	PP	0.10	\$375.00	\$37.50
01/26/2021	TC with clients re settlement proposal	PP	0.30	\$375.00	\$112.50
01/27/2021	TC with opposing counsel re settlement	PP	0.20	\$375.00	\$75.00
01/28/2021	TCs with client re settlement	PP	0.10	\$375.00	\$37.50
01/29/2021	TC with Brendan Sweeney re settlement	PP	0.20	\$375.00	\$75.00
02/01/2021	Tcs with Brendan Sweeney, S. Moser, and clients re settlement, draft letter to Court re settlement, emails with B. Sweeney re letter, e-file same	PP	0.50	\$375.00	\$187.50
02/02/2021	Email to opposing counsel re settlement call	PP	0.10	\$375.00	\$37.50
02/03/2021	Legal research on combined FLSA/NYLL settlements	PP	0.10	\$375.00	\$37.50
02/03/2021	TC with Brendan Sweeney and Steve Moser re form of settlement	PP	0.80	\$375.00	\$300.00
02/04/2021	Review order and TC with S. Moser re same	PP	0.20	\$375.00	\$75.00
02/05/2021	TC with Brendan Sweeney re Court order and settlement papers	PP	0.10	\$375.00	\$37.50
02/11/2021	TC with opposing counsel re settlement papers	PP	0.10	\$375.00	\$37.50
02/15/2021	Review proposed settlement agreement, TC with S.	PP	0.20	\$375.00	\$75.00

Moser re same					
02/17/2021	Complete notice of consent for Magistrate Judge, begin revising proposed settlement agreement, emails with opposing counsel re same, 10 minute TC with potential Claims Administrator	PP	1.10	\$375.00	\$412.50
02/18/2021	TC with potential claims administrator	PP	0.10	\$375.00	\$37.50
02/18/2021	TC with clients re settlement process	PP	0.20	\$375.00	\$75.00
02/18/2021	Revise settlement agreement and notice, emails with opposing counsel re same	PP	1.90	\$375.00	\$712.50
02/19/2021	TC with Brendan Sweeney re settlement agreement, email with Brendan Sweeney re same	PP	0.50	\$375.00	\$187.50
02/19/2021	Draft letter to Court, emails with opposing counsel, file Consent to Magistrate Judge	PP	1.30	\$375.00	\$487.50
02/23/2021	Review and revise settlement agreement and notice, emails with opposing counsel re same, coordinate Claims Administrator	PP	2.00	\$375.00	\$750.00
02/23/2021	TC with B. Sweeney re damages calculations	PP	0.10	\$375.00	\$37.50
02/23/2021	TC with Claims Administrator re settlement	PP	0.10	\$375.00	\$37.50
03/01/2021	TC with Brendan Sweeney re settlement agreement, review same, TC with clients re same	PP	0.50	\$375.00	\$187.50
03/02/2021	Emails with client and opposing counsel re settlement agreement	PP	0.10	\$375.00	\$37.50
03/03/2021	TCs with Jose Luna Rubio and Brendan Sweeney, emails with opposing counsel re settlement/claims administrator, emails with claims administrator	PP	0.30	\$375.00	\$112.50
03/05/2021	Settlement: File status report and Settlement Agreement via ECF	SJM	0.10	\$500.00	\$50.00
03/05/2021	Collate settlement agreement, finalize approval letter to Court, emails with opposing counsel	PP	0.10	\$375.00	\$37.50
03/09/2021	Emails with opposing counsel re preliminary approval motion	PP	0.10	\$375.00	\$37.50
03/22/2021	Email with opposing counsel re preliminary approval motion	PP	0.10	\$375.00	\$37.50
03/23/2021	Review email from opposing counsel re preliminary approval motion	PP	0.10	\$375.00	\$37.50
03/29/2021	Settlement: Locate and email sample declaration and proposed order for preliminary approval to Paul Pagano	SJM	0.20	\$500.00	\$100.00
03/29/2021	Draft and revise notice of motion, proposed order, declaration, memo of law, proposed notice	PP	5.20	\$375.00	\$1,950.00

03/30/2021	Settlement: Locate sample claim form and release and email to Paul Pagano.	SJM	0.20	\$500.00	\$100.00
03/30/2021	Revise all motion docs and email same to opposing counsel for review	PP	2.40	\$375.00	\$900.00
03/31/2021	Settlement: Review PP proposed edits to Notice of Motion, Memorandum of Law, Declaration, Class Notice, Claim form and release	SJM	1.10	\$500.00	\$550.00
04/02/2021	TC with opposing counsel and S. Moser re preliminary approval motion	PP	0.10	\$375.00	\$37.50
04/05/2021	Put all motion documents in final and email to opposing counsel	PP	0.90	\$375.00	\$337.50
04/08/2021	TC with clients re next steps, email with clients with mol	PP	0.40	\$375.00	\$150.00
04/09/2021	Finalize and efile approval motion papers	PP	0.80	\$375.00	\$300.00
04/26/2021	Calendar dates from order, email with Analytics re order, notice and consent form	PP	0.20	\$375.00	\$75.00
04/30/2021	Email with Analytics re settlement	PP	0.10	\$375.00	\$37.50
05/05/2021	Emails with Analytics and opposing counsel, review and revise notice documents	PP	0.70	\$375.00	\$262.50
05/06/2021	Email with Analytics re documents	PP	0.10	\$375.00	\$37.50
05/10/2021	Email with clients re conference call for status update, emails with Analytics and opposing counsel re frequency of updates	PP	0.10	\$375.00	\$37.50
05/12/2021	TCs with clients	PP	0.20	\$375.00	\$75.00
05/14/2021	Email with opposing counsel re Named Plaintiffs	PP	0.10	\$375.00	\$37.50
05/17/2021	Email with Analytics re status update	PP	0.10	\$375.00	\$37.50
05/19/2021	Review report from Analytics	PP	0.10	\$375.00	\$37.50
06/02/2021	Emails with Analytics re updated report, review same	PP	0.10	\$375.00	\$37.50
06/04/2021	TC with class member, email with same	PP	0.30	\$375.00	\$112.50
06/07/2021	Emails with Analytics re reporting, review reports	PP	0.10	\$375.00	\$37.50
06/15/2021	Emails with Analytics	PP	0.10	\$375.00	\$37.50
06/28/2021	Review email from Analytics, email with opposing counsel	PP	0.30	\$375.00	\$112.50
07/12/2021	Email to Brendan Sweeney re calculations and final approval motion	PP	0.10	\$375.00	\$37.50
07/15/2021	Review email from Brendan Sweeney re calculations and motion	PP	0.10	\$375.00	\$37.50



07/19/2021	Conduct damages calculation for class and individual plaintiffs, emails with Analytics re cost of services	PP	0.30	\$375.00	\$112.50
07/23/2021	Draft and revise final approval motion	PP	1.60	\$375.00	\$600.00
07/26/2021	Continue working on final approval motion, LM for opposing counsel	PP	2.00	\$375.00	\$750.00
07/27/2021	TC with Brendan Sweeney re settlement, continue work on final approval motion papers	PP	1.00	\$375.00	\$375.00
07/28/2021	Finalize first draft of final approval motion, email with opposing counsel re same	PP	1.00	\$375.00	\$375.00
08/02/2021	Review and revise approval motion, email with opposing counsel re same	PP	0.10	\$375.00	\$37.50
08/04/2021	Emails w B. Sweeney requesting update	PP	0.10	\$375.00	\$37.50
				<b>Subtotal</b>	<b>\$45,905.00</b>
				<b>Total</b>	<b>\$45,905.00</b>

## Detailed Statement of Account

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
83	09/04/2021	\$45,905.00	\$0.00	\$45,905.00
			Outstanding Balance	\$45,905.00
			Total Amount Outstanding	\$45,905.00

Please make all amounts payable to: Moser Law Firm, PC